

1 GEORGE B. HIBBELER, ESQ.
2 Nevada Bar No: 7746
3 871 Coronado Center Dr., Ste. 200
4 Henderson, NV 89052
5 (702) 804-4279
6 Fax: (702) 804-4781
7 george@georgehibbeler.com
8 *Attorney for Plaintiff*

9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THOMAS LAYTON;

Plaintiff,

vs.

GREEN VALLEY VILLAGE COMMUNITY
ASSOCIATION, a Nevada not for profit
Corporation dba GREEN VALLEY VILLAGE
HOA; ASSURED REAL ESTATE, INC., a
Nevada Corporation; TERRA WEST
COLLECTIONS GROUP, LLC, a Nevada
Limited Liability Company dba ASSESSMENT
MANAGEMENT SERVICES; JOSEPH
YAKUBIK, an individual; DOES I-X inclusive;
ROE ; CORPORATIONS XI-XX inclusive;

Defendant(s).

Case No. 2:14-cv-01347-
GMN-GWF

**STIPULATION AND
ORDER TO CONTINUE
THE SCHEDULED
DEPOSITIONS AND
EXTEND DEADLINE FOR
COMPLETION OF
DISCOVERY AND OTHER
PENDING DEADLINES.
(First Request)**

The parties herein, through their respective counsel, hereby stipulate and agree that the depositions of Michael Unger and Jospheh Yakubic scheduled for April 22, 2015 and the deposition of Thomas Layton scheduled for April 23, 2015 be continued. That the deadline for completion of discovery which is currently, April 24, 2015, be extended by sixty (60) days until June 25, 2015. That the pending date for filing dispositive motions also be extended sixty days until July 24, 2015. That the (Joint) Pretrial Order is required on or before August 25, 2015 or 30 days after the

1 decision deciding the dispositive motion. This is the parties first request for an extension of these
 2 deadlines. This stipulation is made in good faith and is not anticipated or intended to cause any
 3 delay to any party and good cause exists as follows:

4 (1) Interrogatories and requests for production of documents to Plaintiff, Thomas
 5 Layton were served by Defendant on or about March 25, 2015. Responses are due on April 25,
 6 2015. The depositions of Michael Unger and Jospheh Yakubic were scheduled for April 22, 2015
 7 and the deposition of Thomas Layton was scheduled for April 23, 2015.

8 (2) No other discovery remains to be completed but the interrogatories, requests for
 9 production of documents and depositions stated previously.

10 (3) The discovery remains to be completed because, despite the parties diligent
 11 attempts to schedule the depositions during the months of March and April, due to conflicts in
 12 their schedules, the parties were not able to agree to deposition dates. The deposition of Thomas
 13 Layton was scheduled on April 23, 2015 and the depositions of Michael Unger and Joseph
 14 Yakubic had been scheduled for April 22, 2015. However, both Michael Unger and Joseph
 15 Yakubic are unavailable due to schedule conflicts on April 22, 2015 and Defendants contend that
 16 they were not given sufficient notice for this deposition date. Plaintiff contends that the notice was
 17 sufficient.

18 (4) Therefore, rather than burdening the court with unnecessary litigation of this issue,
 19 the parties have agreed that the scheduled depositions be continued and tentatively rescheduled for
 20 May 14th and 15th and the deadline of completion of discovery be extended for sixty (60) days to
 21 June 25, 2015. That the pending date for filing dispositive motions also be extended sixty days
 22 until July 24, 2015. That the (Joint) Pretrial Order is required on or before August 25, 2015 or 30

23 ...

24 ...

25 ...

26 ...

27 ...

28 ...

1 days after the decision deciding the dispositive motion.

2

3 **DATED** this 21 day of April 2015

4

5 **GEORGE B. HIBBELER, ESQ.**

GREENBERG TRAUIG, LLP

6 By: /s/ George B. Hibbeler, Esq.

By: /s/ Leslie S. Godfrey, Esq.

7 George B. Hibbeler, Esq.

Tyler R. Andrews, Esq.

8 Nevada Bar No. 7746

Nevada Bar No. 9499

871 Coronado Center Dr., Ste. 200

Leslie S. Godfrey, Esq.

Henderson, Nevada 89012

Nevada Bar No. 10229

9 *Attorney for Plaintiff*

Greenberg Traurig, LLP

3773 Howard Hughes Parkway

Suite 400 North

Las Vegas, Nevada 89169

10

11

Attorney for Defendants

12

13

IT IS SO ORDERED

14

15


UNITED STATES MAGISTRATE JUDGE

16

Dated: April 23, 2015

17

18

19

20

21

22

23

24

25

26

27

28

LAW OFFICES
GEORGE B. HIBBELER, P.C.
871 CORONADO CENTER DRIVE #200
HENDERSON, NV 89052
Phone: (702) 804-4279 Fax: (702) 804-4781